

HON. SYLVIA O. HINDS-RADIX  
Corporation Counsel

THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, N.Y. 10007

MARY JANE ANDERSON  
Assistant Corporation Counsel  
Phone.: (212) 356-2415  
Fax: (212) 356-3509  
maanders@law.nyc.gov

March 7, 2024

**VIA E.C.F.**

Honorable Gabriel W. Gorenstein  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**MEMORANDUM ENDORSED**

Re: Jason Goodman v. the City of New York, et al.,  
23 Civ. 9648 (JGLC) (GWG)

Your Honor:

I am an Assistant Corporation Counsel of the New York City Law Department and the attorney representing defendant the City of New York and Officer Castro in this matter. The City writes to respectfully request a brief, additional one week extension of time to respond to the operative pleading in this matter from March 11, 2024, to March 18, 2024, and to respectfully request that the Court *sua sponte* extend the time for the individual defendants to respond by the same. This is the City's fourth request for such an extension. Plaintiff does not consent to the instant request. Plaintiff stated that he is "very angry" and he believed that we would settle this matter, not move to dismiss the case. He stated that the Defendants are delaying the case. Defendant Sharp consents to the instant request, and Defendant "X Corporation" does not oppose the request.

By way of background, on January 19, 2024, we asked the Court for a forty-five day extension of time to respond to the Complaint. (ECF No. 42). That request was denied, as Plaintiff's position was not noted in the letter. (ECF No. 43). On February 5, 2024, we renewed that motion, noting that Plaintiff consented to the request, and it was granted. (ECF Nos. 50, 51). On February 29, 2024, we requested an additional week to respond to the Complaint. (ECF No. 62). On March 1, 2024, that request was granted. (ECF No. 63).

Last week, while in the process of writing the motion, Plaintiff sent us video footage of the underlying incident. We are discussing internally the ways that the footage may affect our motion, and as such, require additional time to finalize that motion.<sup>1</sup>

I thank the Court for its time and consideration herein.

Respectfully submitted,

Mary Jane Anderson /s/

Mary Jane Anderson  
Assistant Corporation Counsel  
Special Federal Litigation Division


Cc: VIA FIRST-CLASS MAIL & EMAIL

Jason Goodman  
252 7th Avenue  
Apt. 6S  
New York, NY 10001  
[truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)

VIA ECF  
Counsel of Record

Extension to March 18, 2024, granted.

So Ordered.

  
\_\_\_\_\_  
GABRIEL W. CORENSTEIN  
United States Magistrate Judge  
March 8, 2024

---

<sup>1</sup> While we do not yet represent all of the individual defendants, we intend to finalize representation by the time the motion is filed. Accordingly, since defendants Ebrahim, Garcia, and Caruso are not yet represented by this office, we request that the Court *sua sponte* extend the time for their motion to dismiss to be submitted.